1	FRANK M. FLANSBURG III, ESQ., Nevada Bar No. 6974 fflansburg@bhfs.com		
2	EMILY A. ELLIS, ESQ., Nevada Bar No. 11956 eellis@bhfs.com		
3	EMILY L. DYER, ESQ., Nevada Bar No. 14512 edyer@bhfs.com		
4	BROWNSTEIN HYATT FARBER SCHRECK, LLP 100 North City Parkway, Suite 1600		
5	Las Vegas, NV 89106-4614 Telephone: 702.382.2101		
6	Facsimile: 702.382.8135		
7	Attorneys for Defendants		
8			
9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA		
11	ERNEST BOCK, L.L.C,	CASE NO.: 2:19-cv-01065-JAD-EJY	
12	Plaintiff,		
13	VS.		
14	PAUL STEELMAN, individually; PAUL	STIPULATION AND [PROPOSED] ORDER TO EXTEND THE	
15	STEELMAN, as trustee of the Steelman Asset Protection Trust; MARYANN	DEADLINE TO RESPOND TO THE THIRD AMENDED COMPLAINT	
16	STEELMAN, individually; MARYANN STEELMAN, as trustee of the Steelman	THE THIRD AMENDED COMI DAINT	
17	Asset Protection Trust; STEPHEN		
18	STEELMAN; SUZANNE STEELMAN TAYLOR; JOHN DOE 1 AS TRUSTEE		
19	OF PAUL C. STEELMAN AND MARYANN T. STEELMAN PEYOCARLE LIVING TRUST, JOHN		
20	REVOCABLE LIVING TRUST; JOHN DOE 2 AS TRUSTEE OF STEPHEN P.		
21	STEELMAN IRREVOCABLE TRUST; JOHN DOE 3 AS TRUSTEE OF		
22	SUZANNE T. STEELMAN IRREVOCABLE TRUST; JOHN DOE 4		
23	AS TRUSTEE OF THE STEELMAN ASSET PROTECTION TRUST; JOHN		
24	DOE 5-14 AS TRUSTEES OF THE ABC TRUSTS 1-10; JOHN DOES 15-24; and		
25	ABC COMPANIES 1-10, jointly, severally, and in the alternative,		
26	Defendants.		
27			
28			
	22082248.1	1	

STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DEADLINE TO RESPOND TO THE THIRD AMENDED COMPLAINT

Defendants Paul Steelman, Maryann Steelman, Steelman Asset Protection Trust, Stephen Steelman, Suzanne Steelman Taylor, Trustee of Paul C. Steelman and Maryann T. Steelman Revocable Living Trust, Trustee of Stephen P. Steelman Irrevocable Trust, and Trustee of Suzanne T. Steelman Irrevocable Trust (collectively "Steelman Parties"), and Plaintiff Ernest Bock, L.L.C ("Bock"), by and through their attorneys of record, hereby stipulate and agree, subject to this Court's approval, to extend the deadline for the Steelman Parties to respond to the Third Amended Complaint as follows:

- 1. Bock filed its Third Amended Complaint on December 30, 2020 (ECF No. 98);
- 2. The Steelman Parties' response to the Third Amended Complaint is currently due on January 13, 2021;
- 3. The Steelman Parties requested a two-week extension of time to respond to the Third Amended Complaint, and Bock provided the extension; and

///
///
///
///
///
22082248.1

1	4. The parties agree and hereby stipulate, subject to this Court's approval, that the		
2	deadline for the Steelman Parties to respond to the Third Amended is extended to January 27,		
3	2021. The foregoing stipulation is made in good faith and is not made for the purpose of delay or		
4	for any other improper purpose.		
5	DATED: January 13, 2021	DATED: January 13 2021	
6 7	BROWNSTEIN HYATT FARBER SCHRECK, LLP	WEINBERG, WHEELER, HUDGINS, GUNN & DIAL, LLC	
8	BY: /s/ Frank M. Flansburg III FRANK M. FLANSBURG III, ESQ., #6974 fflansburg@bhfs.com	DAVID J. LARSON, ESQ., #8837 dlarson@wwhgd.com	
9	EMILY A. ELLIS, ESQ., #11956 eellis@bhfs.com	RYAN T. GORMLEY, Esq., #13494 rgormley@wwhgd.com 6385 South Rainbow Blvd., Suite 400	
11	Emily L. Dyer, Esq. edyer@bhfs.com	Las Vegas, NV 89118	
12	100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614	Local Counsel for Plaintiff	
13	Attorneys for Defendants	HANKIN, SANDMAN, PALLADINO, WEINTROB & BELL, P.C.	
14		,	
15		BY: <u>/s/ Evan M. Labov</u> JOHN F. PALLADINO, ESQ. (pro hac vice)	
16		john@hankinsandman.com EVAN M. LABOV, ESQ. (pro hac vice)	
17		evanl@hankinsandman.com 30 South New York Avenue	
18		Atlantic City, NJ 08401	
19		Pro-Hac Counsel for Plaintiff	
20			
21			
22	404	<u>RDER</u>	
23	IT IS SO ORDERED on this 13th d	ay of, 2021.	
24	Con	mat 2 auchah	
25	E	AYNA J. YOUCHAH)	
26		ITED STAPĖS MAGISTRATE JUDGE	
27			
28			

22082248.1